



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY
D.T.E. 05-27

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO LOCAL 273 of the UTILITY WORKERS UNION OF AMERICA

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Local 273 ("Local 273") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Local in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
2. The term "Motion" shall refer to Local 273's Motion to Preserve Status Quo, filed on June 13, 2005.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Local or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit one (1) copy of the responses to Caroline M. Bulger, Hearing Officer, seven (7) copies of the responses to A. John Sullivan, Rates and Revenue Requirement Division, and one (1) copy to Andreas Thanos.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to caroline.bulger@state.ma.us, dte.efiling@state.ma.us, and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

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| DTE 1-1 | Please refer to Motion at 1. Local 273 states “NiSource, the parent company of Bay State, has recently chosen IBM to outsource jobs in as many as seven NiSource departments.” Provide all documentation and memorandum available to Local 273 to support this assertion. |
| DTE 1-2 | Please refer to Motion at 1. Local 273 states that NiSource began circulating a document entitled “NiSource Outsourcing Fact Sheet” on April 29. Please provide the “NiSource Outsourcing Fact Sheet.” |
| DTE 1-3 | Please refer to Motion at 2. Local 273 states that NiSource circulated a memorandum on May 24, 2005, “advising employees that the outsourcing arrangement with IBM ‘will result in some job eliminations.’” Please provide this memorandum. |
| DTE 1-4 | Please refer to Motion at 2. Local 273 states that 100 jobs at Bay State may be affected by the outsourcing activity. Please explain how Local 273 arrived at the figure of 100 Bay State jobs, providing all documentation and memorandum available to Local 273 to support this assertion. |

- DTE 1-5 Please refer to Motion at 2. Please provide the “IBM Personal Profile Sheet” circulated to Bay State employees.
- DTE 1-6 Please refer to Motion at 2. Local 273 states “Bay State employees whose jobs are most likely to be outsourced include those who perform billing functions and those involved in answering phones and providing customer service.” Explain why Local 273 asserts that billing and customer service functions are most likely to be affected, providing all supporting documentation.
- DTE 1-7 Please refer to Motion at 2-3. Local 273 states the telephone response rate of Bay State and its New Hampshire affiliate “plummeted” as a result of staffing level reductions at the company’s Springfield call center approximately three years ago. Provide evidence supporting this telephone response characterization; also, explain and document, in detail, why Local 273 asserts the company’s response rate was detrimentally affected as a result of staff reductions.

DATED: June 22, 2005